

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FARRAH KULE-RUBIN, LANA RYBAK, SHEILA YEN-
PFISTER, JEANETTE PENALVER, REBECCA
SCHLOSSBERG, TIEU PHAN CHAN, LAI WAN NG,
SHAOLI HU ZHANG, CLAUDETTE JEAN-BAPTISTE,
MOON CHAN and FUN YIM NG,

Plaintiffs,

- against -

BAHARI GROUP LIMITED; REZA BAHARI, in his
individual and official capacities; FATTANEH BAHARI, in
her individual and official capacities; and "JOHN DOES 1
through 5," whose names are not currently known, in their
individual and official capacities,

Defendants.

Civil Action No.:
11 CIV 2424 (TPG) (JLC)

DECLARATION OF FUN
YIM NG

I, Fun Yim Ng, hereby declare and state:

1. I currently reside at 77 Madison Street, #21, in New York, New York and did so at the time of the filing of my Complaint.
2. I worked for Defendants Bahari Group Limited ("Bahari Group"), Reza Bahari, and Fattaneh Bahari (collectively, "Defendants") from in or around 1994 to November 30, 2010.
3. I worked as a Patternmaker at Bahari Group.
4. During 2010, my agreed upon rate of compensation was \$74,900 per year. I was paid bi-weekly with a gross base salary of \$2,880.77.
5. I worked at least 40 hours per week (8 hours per day) throughout my employment with Defendants, and particularly, throughout the month of November 2010.

6. Defendants stopped paying my earned salary and other wages, effective November 1, 2010.

7. Defendants told me that if I continued my employment with Defendants, then my previously earned wages and all wages earned in the future would be paid.

8. My employment at Bahari Group abruptly came to an end on November 30, 2010, when Defendants terminated me.

9. I have not received any of the wages owed to me since my termination on November 30, 2010.

10. I was not paid for the entire month of November 2010, in addition to periods in October 2010.

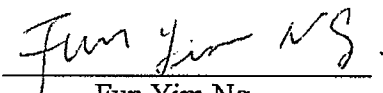
11. The month of November 2010 consisted of four weeks and two days (22 business days), for which I was not compensated. At my regular rate of pay, this would total \$6,337.69.

12. Defendants also failed to compensate me for the twenty days of accrued and unused vacation time after my termination on November 30, 2010. At my regular rate of pay, this would total \$5,761.54.

13. Thus, at my agreed upon rate of compensation, I am owed approximately \$12,099.23 in wages (including unused and accrued vacation time).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13 day of June 2012.


Fun Yim Ng